

**JONI L. GRAY, ESQUIRE**  
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**(856) 988-9055**  
**Attorney for Debtor(s)**

**IN RE:**

**MICHAEL P. SULLIVAN and**  
**KRISTEN A. SULLIVAN**

**Debtor**

**:UNITED STATES BANKRUPTCY COURT**  
**: DISTRICT OF NEW JERSEY**  
**:**   
**: CHAPTER 13**  
**: CASE NO.: 12-25363/GMB**  
**:**   
**: NOTICE OF MOTION TO REOPEN**  
**: TO ADMINISTER CHAPTER 7 ASSET**  
**: CASE**  
**:**   
**: RETURN DATE:**  
**: TIME:**  
**: ORAL ARGUMENT REQUESTED**

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**TO:** **Brian Thomas, Chapter 7 Trustee**  
**327 Central Ave., Ste. 103**  
**Linwood, NJ 08221**

**United States Trustee**  
**Jeffrey Sponder**  
**One Newark Center, Ste. 2100**  
**Newark, NJ 07102**

**All creditors on proof of service**

**PLEASE TAKE NOTICE** that the undersigned Attorney for the Debtor shall move before the Honorable Gloria M. Burns, United States Bankruptcy Judge, 401 Market Street, Camden, New Jersey on the \_\_\_\_\_ day of May, 2014 at 10:00AM or as soon thereafter as counsel may be heard for a Motion to Reopen to Administer Chapter 7 Asset Case.

The movant shall rely on the annexed Certification in support of the requested Order.

Oral argument of the Motion are hereby waived unless an Answer is timely filed by the responsive party at least seven (7) days prior to the return date hereof.

As the within Motion requests to reopen the debtor's case and the facts and/or law relied upon do not present complicated or unique questions, it is hereby submitted that no brief is necessary.

**WIZMUR & FINBERG, LLP**  
**Attorneys for Debtor**

DATED: April 28, 2014

/s/ Joni L. Gray

**Joni L. Gray, Esq.**